

State Plan for Independent Living (SPIL) for Colorado for 2014 – 2016

Section 9: Signatures

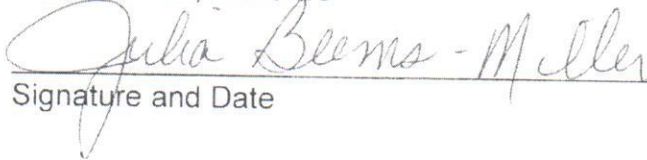
As the authorized signatories, we will sign, date and retain in the files of the state agency(ies) and the Statewide Independent Living Council the Part I: Assurances, 1 – 8, and the separate Certification of Lobbying forms ED-80-0013 for the state independent living program (Part B) and the centers for independent living program (Part C).

The effective date of this SPIL is October 1, 2013.

Signature for the SILC Chairperson

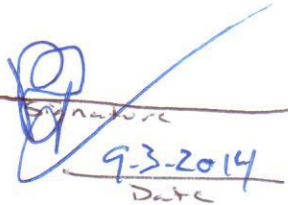
Name: Julia Beems-Miller

Title: Chair, CO SILC


Signature and Date

~~Name: Bona Dahal~~
~~Title: Chair, CO SILC~~

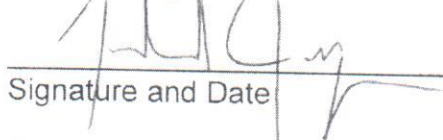
~~6/28/13~~


Signature
9-3-2014
Date

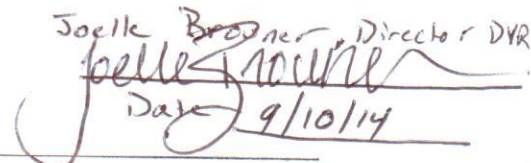
Signature for the DSU Director

Name: Todd Jorgensen

Title: Acting Director, CO Division of Vocational Rehabilitation


Signature and Date

6/28/13

Joelle Brodner, Director DVR

Date 9/10/14

Signature for Separate State Agency for Individuals Who Are Blind

Is there a Separate State Agency for Individuals Who Are Blind? **NO**

State Plan for Independent Living (SPIL) for Colorado for 2014-2016

General Information

Designated Agency Identification

State: Colorado

Agency: Colorado Division of Vocational Rehabilitation

Plan for: 2014-2016

Submitted in fiscal year: 2013

View grant [H169A130009](#) in the Grant Award screen.

Part I: Assurances

Section 1: Legal Basis and Certifications

1.1 The designated State unit (DSU) eligible to submit the State Plan for Independent Living (SPIL or the plan) and authorized under State law to perform the functions of the State under the State Independent Living Services (SILS) and Centers for Independent Living (CIL) programs.

CO Division of Vocational Rehabilitation

1.2 The separate State agency eligible to submit the plan and authorized under State law to provide vocational rehabilitation (VR) services to individuals who are blind.

NA

1.3 The Statewide Independent Living Council (SILC) that meets the requirements of section 705 of the Act and is authorized to perform the functions outlined in section 705(c) of the Act in the State.

CO Statewide Independent Living Council

1.4 The DSU and, if applicable, the separate State agency authorized to provide VR services to individuals who are blind, and the SILC are authorized to jointly develop, sign and submit this SPIL on behalf of the State, and have adopted or otherwise formally approved the SPIL. Yes

1.5 The DSU, and, if applicable, the separate State agency authorized to provide VR services to individuals who are blind, may legally carry out each provision of the plan and will comply with all applicable Federal statutes and regulations in effect with respect to the three-year period it receives funding under the SPIL. Yes

1.6 The SPIL is the basis for State operation and administration of the program. All provisions of the SPIL are consistent with State law. Yes

1.7 The representative of the DSU and, if applicable, of the separate State agency authorized to provide VR services to individuals who are blind, who has the authority under State law to receive, hold, and disburse Federal funds made available under the SPIL and to submit the SPIL jointly with the SILC chairperson is Todd Jorgensen, Acting Director, CO Division of Vocational Rehabilitation.

Section 2: SPIL Development

2.1 The plan shall be reviewed and revised not less than once every three years, to ensure the existence of appropriate planning, financial support and coordination, and other assistance to appropriately address, on a statewide and comprehensive basis, the needs in the State for:

- The provision of State independent living services;

- The development and support of a statewide network of centers for independent living;
- Working relationships between programs providing independent living services and independent living centers, the vocational rehabilitation program established under title I, and other programs providing services for individuals with disabilities.

Yes

2.2 The DSU and SILC conduct public meetings to provide all segments of the public, including interested groups, organizations and individuals, an opportunity to comment on the State plan prior to its submission to the Commissioner and on any revisions to the approved State plan. Yes

2.3 The DSU and SILC establish and maintain a written description of procedures for conducting public meetings in accordance with the following requirements. The DSU and SILC shall provide:

- appropriate and sufficient notice of the public meetings;
- reasonable accommodation to individuals with disabilities who rely on alternative modes of communication in the conduct of the public meetings, including providing sign language interpreters and audio-loops; and
- public meeting notices, written material provided prior to or at the public meetings, and the approved State plan in accessible formats for individuals who rely on alternative modes of communication.

Yes

2.4 At the public meetings to develop the State plan, the DSU and SILC identify those provisions in the SPIL that are State-imposed requirements beyond what would be required to comply with the regulations in 34 CFR parts 364, 365, 366, and 367. Yes

2.5 The DSU will seek to incorporate into, and describe in, the State plan any new methods or approaches for the provision of IL services to older individuals who are blind that are developed under a project funded under chapter 2 of title VII of the Act and that the DSU determines to be effective. Yes

2.6 The DSU and SILC actively consult, as appropriate, in the development of the State plan with the director of the Client Assistance Program (CAP) authorized under section 112 of the Act. Yes

Section 3: Independent Living Services

3.1 The State, directly or through grants or contracts, will provide IL services with Federal, State, or other funds Yes

3.2 Independent living services shall be provided to individuals with significant disabilities in accordance with an independent living plan mutually agreed upon by an appropriate staff

member of the service provider and the individual, unless the individual signs a waiver stating that such a plan is unnecessary. Yes

3.3 All service providers will use formats that are accessible to notify individuals seeking or receiving IL services under chapter 1 of title VII about:

- the availability of the CAP authorized by section 112 of the Act;
- the purposes of the services provided under the CAP; and
- how to contact the CAP.

Yes

3.4 Participating service providers meet all applicable State licensure or certification requirements. Yes

Section 4: Eligibility

4.1 Any individual with a significant disability, as defined in 34 CFR 364.4(b), is eligible for IL services under the SILS and CIL programs authorized under chapter 1 of title VII of the Act. Any individual may seek information about IL services under these programs and request referral to other services and programs for individuals with significant disabilities, as appropriate. The determination of an individual's eligibility for IL services under the SILS and CIL programs meets the requirements of 34 CFR 364.51. Yes

4.2 Service providers apply eligibility requirements without regard to age, color, creed, gender, national origin, race, religion or type of significant disability of the individual applying for IL services. Yes

4.3 Service providers do not impose any State or local residence requirement that excludes any individual who is present in the State and who is otherwise eligible for IL services from receiving IL services. Yes

Section 5: Staffing Requirements

5.1 Service provider staff includes personnel who are specialists in the development and provision of IL services and in the development and support of centers. Yes

5.2 To the maximum extent feasible, a service provider makes available personnel able to communicate:

- with individuals with significant disabilities who rely on alternative modes of communication, such as manual communication, nonverbal communication, nonverbal communication devices, Braille or audio tapes, and who apply for or receive IL services under title VII of the Act; and
- in the native languages of individuals with significant disabilities whose English proficiency is limited and who apply for or receive IL services under title VII of the Act.

Yes

5.3 Service providers establish and maintain a program of staff development for all classes of positions involved in providing IL services and, if appropriate, in administering the CIL program. The staff development programs emphasize improving the skills of staff directly responsible for the provision of IL services, including knowledge of and practice in the IL philosophy. Yes

5.4 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will take affirmative action to employ and advance in employment qualified individuals with significant disabilities on the same terms and conditions required with respect to the employment of individuals with disabilities under section 503 of the Act. Yes

Section 6: Fiscal Control and Fund Accounting

6.1 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will comply with applicable EDGAR fiscal and accounting requirements and will adopt those fiscal control and fund accounting procedures as may be necessary to ensure the proper disbursement of and accounting for those funds. Yes

Section 7: Recordkeeping, Access and Reporting

7.1 In addition to complying with applicable EDGAR recordkeeping requirements, all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will maintain records that fully disclose and document:

- the amount and disposition by the recipient of that financial assistance;
- The total cost of the project or undertaking in connection with which the financial assistance is given or used;
- the amount of that portion of the cost of the project or undertaking supplied by other sources;
- compliance with the requirements of chapter 1 of title VII of the Act and Part 364 of the regulations; and
- other information that the Commissioner determines to be appropriate to facilitate an effective audit.

Yes

7.2 With respect to the records that are required by 34 CFR 364.35, all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will submit reports that the Commissioner determines to be appropriate. Yes

7.3 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will provide access to the Commissioner and the Comptroller General, or any of their duly authorized representatives, to the records listed in 34 CFR 364.37 for the purpose of conducting audits, examinations, and compliance reviews. Yes

Section 8: Protection, Use and Release of Personal Information

8.1 Each service provider will adopt and implement policies and procedures to safeguard the confidentiality of all personal information, including photographs and lists of names in accordance with the requirements of 34 CFR 364.56(a)(1-6). Yes

Section 9: Signatures

As the authorized signatories, we will sign, date and retain in the files of the state agency(ies) and the Statewide Independent Living Council the Part I: Assurances, 1-8, and the separate Certification of Lobbying forms ED-80-0013 (available in [MS Word](#) and [PDF](#) formats) for the state independent living program (Part B) and the centers for independent living program (Part C).

The effective date of this SPIL is October 1, 2013.

Section 9: Signature for SILC Chairperson

Name Julia Beems-Miller

Title Chair, CO SILC

Signed? Yes

Date signed 07/30/2013

Section 9: Signature for DSU Director

Name Todd Jorgensen

Title Acting Director, CO Division of Vocational Rehabilitation

Signed? Yes

Date signed 07/30/2013

Section 9: Signature for Separate State Agency for Individuals Who Are Blind

Is there a Separate State Agency for Individuals Who Are Blind? No

Name

Title

Signed? No

Date signed

The SILC, DSU and, if applicable, the separate state agency for individuals who are blind, provide the following additional assurance(s) which RSA has deemed necessary to ensure the state's compliance with the assurances in sections 1 through 8, above, as a condition for approval of this SPIL Yes

Enter text for additional assurance here:

Additional Assurances As a condition for Rehabilitation Services Administration (RSA) approval of the FFY 2014-2016 Colorado State Plan for Independent Living, the Colorado Division of Vocational Rehabilitation and the Colorado Statewide Independent Living Council (SILC) jointly assure RSA that, by December 1, 2013, they will submit documentation demonstrating that the SILC has been brought into compliance with the requirement that each SILC member serve for full three-year terms (except when a member is appointed to fill a vacancy occurring prior to the expiration of a term) as well as with all other federal requirements regarding SILC appointment, composition and terms outlined in 34 CFR 364.21(b) - (f).

Additional Assurances: Signature for SILC Chairperson

Name Anna French

Title SILC Chair

Signed? Yes

Date signed 09/24/2013

Additional Assurances: Signature for DSU Director

Name Todd Jorgensen

Title Acting Director, DVR

Signed? Yes

Date signed 09/24/2013

Additional Assurances: Signature for Separate State Agency for Individuals Who Are Blind

Is there a Separate State Agency for Individuals Who Are Blind? No

Name

Title

Signed? No

Date signed

The following information is captured by the MIS.

Additional assurances last updated on: 25-Sep-13 - 7:41 AM

Additional assurances last updated by: rsacotterd

Part II: Narrative: Section 1 - Goals, Objectives and Activities

Section 1: Goals, Objectives and Activities 1.1 Goals and Mission

Describe the overall goals and mission of the State's IL programs and services. The SPIL must address the goals and mission of both the SILS and the CIL programs, including those of the State agency for individuals who are blind as they relate to the parts of the SPIL administered by that agency.

Goal Name: Goal 1 Identify Disability Population Hubs

Goal Description:

Mission

Colorado's Independent Living Partners (DSU, SILC, and the Statewide Network of Independent Living Centers) commit the next three years to re-establishing our grassroots perspective, building the capacity of our IL centers, and improving statewide access to independent living services. We will seek greater involvement of the people we serve, exploring natural supports for community living. With our stakeholders, we will help shape communities that recognize full inclusion and diversity as a necessary part of community success and well-being.

Goal 1

Disability population hubs will be identified in both rural and urban areas, allowing for more targeted outreach and efficient use of resources through the SILC SPIL ad hoc committee.

Goal Name: Goal 2 Increase Capacity of Centers to provide services

Goal Description:

Goal 2

The IL Partners will work together to increase the capacity of centers to provide services throughout their catchment areas.

Goal Name: Goal 3 Increase Involvement of Youth in Independent Living

Goal Description:

Goal 3

We will increase the involvement of youth in independent living programs, creating a natural succession plan for the future of independent living.

1.2 Objectives

1.2A. Specify the objectives to be achieved and the time frame for achieving them.

Goal(s) from Section 1.1	Objective to be achieved	Time frame start date	Time frame end date
Goal 1 Identify Disability Population Hubs	<p>Objective 1A: Gather information to create an understanding of service areas. YEAR ONE</p> <p>Activities:</p> <ul style="list-style-type: none"> ? use new census, ACS data, and other relevant data groups to create maps ? Identify key towns/disability populations (SILC ad hoc committee to include at least two CIL directors) ? Create visual images of the state by mapping: <ul style="list-style-type: none"> o existing services & support groups o existing IL services o disability-specific populations o disability populations by age o homeless populations (Point in Time Survey) o other relevant data offered by IL partners and stakeholders <p>(SILC and DSU)</p> <ul style="list-style-type: none"> ? identify where outreach is needed (SILC ad hoc committee) 	10/01/2013	09/30/2014

	<p>Outcome Measure:</p> <p>? Compilation of information delineating existing populations of and services already in existence for Colorado's citizens with significant disabilities.</p> <p>? survey CILs on helpfulness of data by June 30, 2014.</p>		
Goal 1 Identify Disability Population Hubs	<p>Objective 1B: Identify the service needs of underserved populations. YEAR ONE</p> <p>Activities:</p> <p>? survey communities on preferred services, onsite and web (SILC ad hoc committee will develop survey questions; SILC, DSU and CILs will post survey on websites; SILC will conduct three focus groups based on data collected in Objective 1A)</p> <p>? survey communities on preferred delivery methods, onsite and web (SILC ad hoc committee will develop survey questions; SILC, DSU and CILs will post survey on websites; SILC will conduct three focus groups based on data collected in Objective 1A)</p> <p>? Compile information to guide outreach to underserved communities in Colorado</p>	10/01/2013	09/30/2014
Goal 1 Identify Disability Population Hubs	<p>Objective 1C: Create a targeted outreach plan YEAR ONE, After completion of 1A and 1B</p> <p>Activities:</p> <p>? Use maps to identify potential collaborations with local support groups and service providers (CILs)</p>	10/01/2013	09/30/2014

	<p>? develop standardized outreach materials about the IL program (team made up of DSU, SILC, CIL directors; some financial support from SILC for writing and printing)</p> <p>? provide educational and other events through collaborations with local agencies (CILs)</p> <p>? develop mechanism for sharing outreach results among IL partners. (DSU)</p> <p>Outcome Measure: survey CILs on new collaborations, materials distributed, and outreach events by September 30, 2014.</p>		
<p>Goal 2 Increase Capacity of Centers to provide services</p>	<p>Objective 2A: Staff Development</p> <p>YEARS 1-3</p> <p>Activities:</p> <p>? IL training opportunities</p> <p>o SILC will budget for 2 online trainings per non-Part C center (4), per year ONGOING</p> <p>o The DSU and CILs in collaboration with the SILC will host a statewide conference for IL staff that will include time for public input on the SPIL and its implementation YEAR TWO</p> <p>? Determine which of the ILRU training modules will be required for IL staff to complete to meet Title VII qualified staff requirements (DSU) YEAR ONE</p> <p>? Create networking opportunities for the SILC to identify local area issues, including continuation of the SILC/IL Staff committee (SILC, DSU, CILs)</p>	<p>10/01/2013</p>	<p>09/30/2016</p>

	<p>ONGOING</p> <p>* Support a rural CIL to apply for peer mentoring through APRIL, ideas and techniques can then be shared with other CILs</p> <p>? Make training available on:</p> <ul style="list-style-type: none"> o collaboration techniques for CILs to work with community organizations o using volunteers in a way that is meaningful to the CIL and the volunteer <p>YEAR TWO (DSU and CILs in collaboration with the SILC)</p> <p>Outcome Measures:</p> <p>? CILs develop staff development and training opportunity policies to ensure qualified staff</p> <p>? Each center will provide to the SILC staff development and training opportunities and number of staff attending those trainings on a quarterly basis.</p> <p>? The DSU will compare compliance reviews from 2010 and track compliance review issues documented during the current SPIL.</p>		
<p>Goal 2 Increase Capacity of Centers to provide services</p>	<p>Objective 2B: Support Resource Development on statewide basis</p> <p>Activities:</p> <p>? solicit information from CILs on diversified funding models and their perceived best practices</p> <p>? Solicit information from CILs about subscriptions to aid resource development that can be shared</p>	<p>10/01/2013</p>	<p>09/30/2015</p>

	<p>amongst the network of Center (DSU) YEAR ONE</p> <p>? purchase subscriptions (DSU) YEAR ONE</p> <p>? The DSU and SILC will explore the opportunity of hiring a VISTA or other service agency staff to work with all Colorado CILs in the following areas: (Hire staff in YEAR ONE; implementation in YEAR TWO)</p> <ul style="list-style-type: none"> o strategic planning training o develop measurable outcomes for fundraising o grant writing training/support o fee for service development <p>Outcome Measure: In the last quarter of the SPIL, the SILC will produce a report on increase in non-government funding during the SPIL period.</p>		
<p>Goal 2 Increase Capacity of Centers to provide services</p>	<p>Objective 2C: Explore the use of technology and non-traditional methods for service delivery</p> <p>Activities:</p> <p>? Use 704 reports to determine percentage of consumers served outside of primary CIL office location (DSU) YEAR ONE</p> <p>? Gather information about the provision of the four core services delivered outside the main CIL offices (DSU) and the preferred method of delivery</p> <ul style="list-style-type: none"> o survey consumers and staff involved in services outside main office (DSU and SILC) YEAR ONE 	<p>10/01/2013</p>	<p>09/30/2016</p>

	<p>? Gather information about rural service delivery from national resources and share with CILs (DSU and CILs) YEAR TWO</p> <p>? Report results of surveys/analyze what is working best in both rural and urban areas. (DSU and CILs with results reported to the SILC) YEAR TWO</p> <p>? Facilitate staff from CILs with good results helping other centers implement new service delivery methods (DSU and CILs) YEAR TWO and THREE</p> <p>Outcome Measure: Use 704 reports during the last quarter of the SPIL to report on increase in services outside of primary CIL locations.(DSU and CILs)</p>		
Goal 2 Increase Capacity of Centers to provide services	<p>Objective 2D: Develop a team to write an annual report on the progress and accomplishments of the IL Network.</p> <p>Activities:</p> <p>? Use 704 reports to collect demographic data, track SPIL goal accomplishments, identify Center best practices, and results of consumer preferences (Objective 1B) and satisfaction surveys.</p> <p>? Updates maps from Objective 1A.</p> <p>Outcome Measure: Development of report that will be shared with stakeholders and potential funders</p>	10/01/2013	09/30/2016
Goal 3 Increase Involvement of Youth in Independent Living	<p>Objective 3A: Educate ourselves about reaching out to youth in meaningful ways.</p> <p>Activities:</p> <p>? collect information about existing</p>	10/01/2013	09/30/2015

	<p>youth organizations and the SILC will create report to share among IL partners (DSU and CILs in collaboration with the SILC) YEAR ONE</p> <p>? Develop relationships with other youth service providers by attending meetings and events and encouraging participation on boards. (SILC, DSU and CILs) YEAR TWO</p> <p>? Branding IL for youth (SILC ad hoc committee with CIL staff) YEAR TWO</p> <p>? Use social media and other culturally appropriate methods to reach youth (SILC, DSU and CILs) YEAR TWO</p> <p>? Develop a Youth Advisory Ad Hoc Committee, made up of youth with disabilities (SILC) YEAR TWO</p> <p>Outcome Measure: The development of a SILC youth advisory committee that will consist of 51% youth with disabilities.</p>		
<p>Goal 3 Increase Involvement of Youth in Independent Living</p>	<p>Objective 3B: Developing youth leadership</p> <p>Activities:</p> <p>? Grow your own? interns by engaging youth in the following activities at CILs: (CILs) YEAR TWO</p> <ul style="list-style-type: none"> o Informational interview o job shadowing o internship o Americorps <p>? a statewide youth summit (DSU and CILs in collaboration with the SILC)</p>		

	<p>YEAR THREE</p> <p>Outcome Measure: At least three centers will provide opportunities to train youth within their own programs.</p>		
Goal 3 Increase Involvement of Youth in Independent Living	<p>Objective 3C: Involve youth at IL centers</p> <p>Activities:</p> <p>? Develop culturally appropriate IL marketing materials for other service providers to give to youth (SILC, CILs) YEAR TWO</p> <p>? Orientation for transitioning youth and parents (CILs) ONGOING</p> <p>? Provide training on benefits during transition (CILs) ONGOING</p> <p>? Tours of centers-coordinated with youth programs (CILs) ONGOING</p> <p>? Participate in youth-focused events (DSU in conjunction with the CILs) ONGOING</p> <p>Outcome measure: Compare the number of youth served by CILs on 2012 704 Reports to those in the most recent 704 Report. All 704 Reports must be submitted to the SILC to monitor SPIL implementation (DSU and CILs) YEAR THREE</p>	10/01/2014	09/30/2015

1.2 Objectives

1.2B Describe the steps planned regarding outreach to populations in the State that are unserved or underserved by programs under title VII, including minority groups and urban and rural populations.

- Identify the populations to be designated for targeted outreach efforts

Using information from the 2010 Census and the American Community Survey, the IL Partners will reexamine disability population hubs throughout the state. By meeting Objectives 1A and

1B, we will have definitive data about the need for services and the best methods for delivering those services. During the development of this SPIL, we have learned through public comment and surveys that the deaf and hard of hearing population still have many unmet needs. The SILC has learned from the last SPIL that Native Americans, Hispanics/Latinos, African Americans, Pacific Islanders, 121 Program, and youth remain underserved and targeted for outreach. Objectives 1B and 1C are designed to mitigate those circumstances. Objective 2A also provides for intensive outreach training that will be offered to IL staff based on findings from Objectives 1A, 1B and 1C.

- Identify the geographic areas (i.e., communities) in which the targeted populations reside

Objectives 1A and 1B describe the ways that we intend to assess the needs in our rural and frontier counties and determine whether current service methods are successful. Information gathered directly from consumers and local service providers will provide guidance for targeted outreach. Seventy-three percent of Colorado's counties are considered either rural or frontier. Rural counties (fewer than 50,000 individuals per county--24 counties) include: Alamosa, Archuleta, Chaffee, Conejos, Crowley, Delta, Eagle, Fremont, Garfield, Grand, La Plata, Lake, Logan, Montezuma, Montrose, Morgan, Otero, Ouray, Phillips, Pitkin, Prowers, Rio Grande, Routt, Summit Frontier Counties (6 or fewer persons per square mile--23 counties) include: Baca, Bent, Cheyenne, Costilla, Custer, Dolores, Gunnison, Hinsdale, Huerfano, Jackson, Kiowa, Kit Carson, Las Animas, Lincoln, Mineral, Moffat, Rio Blanco, Saguache, San Juan, San Miguel, Sedgewick, Washington, Yuma

- Describe how the needs of individuals with significant disabilities from minority group backgrounds will be addressed

During the period of the previous SPIL, efforts to reach minority populations failed. One training on cultural competency was offered to the CIL directors during the last SPIL--it became evident that additional in-depth trainings are still needed. Even though Colorado is not a racially diverse state, from our previous 704 reports we consider minority populations to continue to be underserved. Objectives 1A, 1B and 1C describe new approaches to gather that information and ensure that independent living services are available to minority populations.

1.3 Financial Plan

Describe in sections 1.3A and 1.3B, below, the financial plan for the use of Federal and non-Federal funds to meet the SPIL objectives.

1.3A Financial Plan Tables

Complete the financial plan tables covering years 1, 2 and 3 of this SPIL. For each funding source, provide estimated dollar amounts anticipated for the applicable uses. The financial plan table should include only those funding sources and amounts that are intended to support one or more of the objectives identified in section 1.2 of the SPIL. To the extent possible, the tables and narratives must reflect the applicable financial information from centers for independent living.

Refer to the SPIL Instructions for additional information about completing the financial tables and narratives.

Year 1 - 2014 Approximate funding amounts and uses

Sources	SILC resource plan	IL services	General CIL operations	Other SPIL activities
Title VII Funds				
Title VII Funds Chapter 1, Part B			250000	30000
Title VII Funds Chapter 1, Part C			1002657	
Title VII Funds Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
Other Federal funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)				
Other Federal funds - other				
Non-Federal funds - State funds	48500		2007288	
Non-Federal funds - Other				
Total	48500	0	3259945	30000

Year 2 - 2015 Approximate funding amounts and uses

Sources	SILC resource plan	IL services	General CIL operations	Other SPIL activities
Title VII Funds				
Title VII Funds Chapter 1, Part B			250000	30000
Title VII Funds Chapter 1, Part C			1002657	
Title VII Funds Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
Other Federal funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)				

Other Federal funds - other				
Non-Federal funds - State funds	61000		2007288	
Non-Federal funds - Other				
Total	61000	0	3259945	30000

Year 3 - 2016 Approximate funding amounts and uses

Sources	SILC resource plan	IL services	General CIL operations	Other SPIL activities
Title VII Funds				
Title VII Funds Chapter 1, Part B			250000	
Title VII Funds Chapter 1, Part C			1002657	
Title VII Funds Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
Other Federal funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)				
Other Federal funds - other				
Non-Federal funds - State funds	59000		2007288	
Non-Federal funds - Other				
Total	59000	0	3259945	0

1.3B Financial Plan Narratives

1.3B(1) Specify how the part B, part C and chapter 2 (Older Blind) funds, if applicable, will further the SPIL objectives.

Part B and State funds will be used to fund the resource plan for the SILC.

Center operations will be funded through Chapter 1, Parts B and C funds in addition to State General Funds. Several of the Centers will complete their spend down of their ARRA funds during the course of this SPIL.

The three year time period covered by this SPIL will involve a great deal of research and compiling of data to be carried out by the DSU, the SILC, and representation from the IL Center directors. Outreach efforts to be carried out by the Centers will be funded through Center operational funds. Staff training efforts will be funded through the DSU and staff time committed to training funded through center operational funds. Center-specific activities focused on youth will be funded through operational funding.

1.3B(2) Describe efforts to coordinate Federal and State funding for centers and IL services, including the amounts, sources and purposes of the funding to be coordinated.

Currently, Part B funds provide \$30,000 for a SILC Coordinator; Part B funds are also utilized to fund a portion of the IL Coordinator position. The remaining Part B funds are combined with the State General Fund allocation to support the Colorado State Independent Living Services (SILS) program. These funds are allocated to nine of ten operating Colorado centers for independent living, consisting of five Part C centers and four state funded centers. (Note: One Part C center was out of compliance at the time of this SPIL development and was not receiving State General or Part B funds). State General Funds are divided equally amongst all 9 centers. Part B funds are allocated based on a five-tier system developed to offset the disparities in Part C and local funding. This allocation process is described in the CO IL Program's Procedures Manual; State IL Rules provide guidance on determining the allocation committee and developing the formula. In order to receive SILS funding, all centers must be currently certified in compliance with Title VII, Section 725 of the Federal Act, as defined in 34 CFR 366.60.

State General Funds for each center are approximately \$2,007,288

Part B funds are distributed as follows:

Tier 1 includes centers which will each receive 3.5% of the total amount of Part B funds available.

Atlantis

Tier 2 includes centers which will each receive 6.0% of the total amount of Part B funds available.

CFI, CPWD

Tier 3 includes centers which will each receive 10.0% of available Part B funds.

CO Springs Independence Center

Tier 4 includes centers which will each receive 13% of available Part B funds.

CFD and Connections

Tier 5 includes centers which will each receive 15% of available Part B funds

DRS, ILC/NWCCI, SWIC

1.3B(3) Describe any in-kind resources including plant, equipment or services to be provided in support of the SILC resource plan, IL services, general CIL operations and/or other SPIL objectives.

NA

1.3B(4) Provide any additional information about the financial plan, as appropriate.

NA

1.4 Compatibility with Chapter 1 of Title VII and the CIL Work Plans

1.4A Describe how the SPIL objectives are consistent with and further the purpose of chapter 1 of title VII of the Act as stated in section 701 of the Act and 34 CFR 364.2.

The objectives of this SPIL include developing a foundation of service provision for the next three years based on assessing IL service needs and the development of an outreach plan tailored to meet the needs of un- and underserved populations around the State. Information from consumers and other key stakeholders will be collected through different mechanisms that take into account accessibility preferences and the rural and frontier natures of significant portions of the State. The viability of the IL network will be supported through resource development opportunities on a statewide-basis supporting the provision of the four core services. Relationship-building between youth and the ILCs will foster the development of youth leaders in the state. The objectives included in Colorado's SPIL were developed with the input of Center directors, consumers, and other IL stakeholders accomplishing them will require collaborative relationships amongst all of the parties listed in 34 CFR 364.2. SPIL goals were incorporated into the outcomes and performance measures for the SILS contract.

1.4B Describe how, in developing the SPIL objectives, the DSU and the SILC considered and incorporated, where appropriate, the priorities and objectives established by centers for independent living under section 725(c)(4) of the Act.

Gathering, reading and comparing the work plans from each center's 704 report was the first step in developing the goals of this SPIL. Next, IL directors participated in an activity at a SILC meeting that provided the SILC and DSU with the top five issues the directors wanted addressed in the SPIL. Three IL directors participated on the SILC's SPIL Committee.

1.5 Cooperation, Coordination, and Working Relationships Among Various Entities

Describe the steps that will be taken to maximize the cooperation, coordination and working relationships among the SILS program, the SILC, and centers; the DSU, other State agencies represented on the SILC and other councils that address the needs of specific disability populations and issues; and other public and private entities determined to be appropriate by the SILC.

The description must identify the entities with which the DSU and the SILC will cooperate and coordinate.

The Colorado DVR, the SILC, and the Colorado Association of Centers for Independent Living (ACCIL) have a strong, collaborative working relationship based on open communication and coordinated efforts. The DSU's IL Coordinator, SILC chair and coordinator meet via conference call on a weekly basis; the IL Coordinator and the SILC Coordinator participate in monthly conference calls of the ACCIL; a representative of the SILC attends monthly SRC meetings and provides SILC updates to the SRC and SRC updates to the SILC.

The IL Coordinator provides a DVR update to the SILC's executive committee and to the full SILC at SILC meetings to share information on the agency and to provide a forum for questions, expressions of concerns and sharing of information.

The SILC is actively seeking representation from State and community agencies that will support the state in meeting the three goals included in this SPIL. The SILC will be a member of the National Council on Independent Living and the Association of Programs for Rural Independent Living.

Other state and community organizations that the SILC either has working relationships with or will be seeking:

The Colorado Developmental Disabilities Council

The Colorado Advisory Council for Persons with Disability

The Rocky Mountain Americans with Disabilities Technical Assistance Center

Area Agency on Aging and Adult Resources

The Colorado Commission for the Deaf and Hard of Hearing

The Colorado Assistive Technology Program

The Veteran's Administration

The SILC will begin and/or continue to cooperate and coordinate with state agencies including but not limited to:

Department of Health and Human Services

Department of Housing

Department of Education Transition Services

State Coordinating Council on Transportation

State Medicaid Agency (Health Care Policy and Financing), specifically CTS, the Colorado Community Choice Act, and the Medicaid Buy-In for Working Adults with Disabilities.

The SILC's outreach to un- and underserved populations will include the following for Youth:

High School Transition Programs; the School-to-Work Alliance Program; State Youth Council

For Deaf and Hard of Hearing: Colorado Commission for the Deaf and Hard of Hearing

For Ethnically Diverse (the needs assessment portion of this SPIL will assist to identify gatekeepers into ethnic groups):

El Grupo Vida, ethnic chambers of commerce (Native American, Hispanic, African American, Pacific Islanders), the 121 Program

For people with disabilities living in rural and frontier counties: social service agencies, mental health providers, and DVR Counselors, Area Agencies on Aging and Aging, other organizations and agencies addressing the needs of consumers with significant disabilities

Long Term Care, including the Colorado Living Advisory Group and the Regional Care Collaborative Organization

1.6 Coordination of Services

Describe how IL services funded under chapter 1 of title VII of the Act will be coordinated with and complement other services to avoid unnecessary duplication with other Federal, State, and local programs, including the OIB program authorized by chapter 2 of title VII of the Act, that provide IL- or VR-related services.

There are objectives and activities in this SPIL that drive us toward more collaboration and less duplication. Funds for the SILS program are used for core services by CILs that are rarely offered by non- IL organizations.

1.7 Independent Living Services for Individuals who are Older Blind

Describe how the DSU seeks to incorporate into, and describe in, the State plan any new methods or approaches for the provision of IL services to older individuals who are blind that are developed under the Older Individuals who are Blind program and that the DSU determines to be effective.

This SPIL coincides with a new 3 year funding period for the OIB program in Colorado; innovative approaches to service provision in rural and frontier counties will be incorporated into the annual IL report described in Objective 2D.

Part II: Narrative: Section 2 - Scope, Extent, and Arrangements of Services

2.1 Scope and Extent

2.1A Check the appropriate boxes in the SPIL Instrument table indicating the types of IL services to be provided to meet the objectives identified in section 1.2 of this SPIL, and whether the services will be provided by the CILs or by the DSU (directly and/or through contract or grant).

Table 2.1A: Independent living services	Provided by the DSU (directly)	Provided by the DSU (through contract and/or grant)	Provided by the CILs (Not through DSU contracts/grants)
Core Independent Living Services - Information and referral	No	Yes	Yes
Core Independent Living Services - IL skills training	No	Yes	Yes
Core Independent Living Services - Peer counseling	No	Yes	Yes
Core Independent Living Services - Individual and systems advocacy	No	Yes	Yes
Counseling services, including psychological, psychotherapeutic, and related services	No	No	No
Services related to securing housing or shelter, including services related to community group living, and supportive of the purposes of this Act and of the titles of this Act, and adaptive housing services (including appropriate accommodations to and modifications of any space used to serve, or occupied by, individuals with significant disabilities)	No	Yes	Yes
Rehabilitation technology	Yes	No	No
Mobility training	No	Yes	Yes
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services	No	Yes	Yes
Personal assistance services, including attendant care and the training of personnel providing such services	No	Yes	Yes

Surveys, directories and other activities to identify appropriate housing, recreation, accessible transportation and other support services	No	Yes	Yes
Consumer information programs on rehabilitation and IL services available under this Act, especially for minorities and other individuals with disabilities who have traditionally been unserved or underserved by programs under this Act	No	Yes	Yes
Education and training necessary for living in the community and participating in community activities	No	Yes	Yes
Supported living	No	No	No
Transportation, including referral and assistance for such transportation	No	Yes	Yes
Physical rehabilitation	No	No	No
Therapeutic treatment	No	No	No
Provision of needed prostheses and other appliances and devices	No	No	No
Individual and group social and recreational services	No	Yes	Yes
Training to develop skills specifically designed for youths who are individuals with significant disabilities to promote self-awareness and esteem, develop advocacy and self-empowerment skills, and explore career options	No	Yes	Yes
Services for children with significant disabilities	No	No	No
Services under other Federal, State, or local programs designed to provide resources, training, counseling, or other assistance of substantial benefit in enhancing the independence, productivity, and quality of life of individuals with significant disabilities	No	Yes	Yes
Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future	No	Yes	Yes
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities	No	Yes	Yes
Other necessary services not inconsistent with the Act	No	Yes	Yes

2.1B Describe any service provision priorities, including types of services or populations, established for meeting the SPIL objectives identified in section 1.2.

The SILC, DSU and CIL Directors are working together to reach out to unserved and underserved populations that will be identified by the completion of Goal 1. The goals and objectives of this SPIL are organized in a manner to research, analyze, and implement each component of the SPIL mission. Although we believe we understand which populations are underserved, new information will help us to be specific in our outreach, as well as learning the best methods of service delivery to those populations.

2.1C If the State allows service providers to charge consumers for the cost of services or to consider the ability of individual consumers to pay for the cost of IL services, specify the types of IL services for which costs may be charged and for which a financial need test may be applied, and describe how the State will ensure that:

- Any consideration of financial need is applied uniformly so that all individuals who are eligible for IL services are treated equally; and
- Written policies and consumer documentation required by 34 CFR 364.59(d) will be kept by the service provider.

Indicate N/A if not applicable.

N/A

2.2 Arrangements for State-Provided Services

2.2A If the DSU will provide any of the IL services identified in section 2.1A through grants or contractual arrangements with third parties, describe such arrangements.

The DSU does not provide IL services directly, but utilizes the state contracting system to contract with the network of IL Centers for the provision of the four core IL services and any others identified by consumers. The contracts are the funding vehicles through which State General and Part B funds flow to support the general operations of the Center.

2.2B If the State contracts with or awards a grant to a center for the general operation of the center, describe how the State will ensure that the determination of an individual's eligibility for services from that center shall be delegated to the center.

For State Fiscal Year 2014 (July 1, 2013 - June 30, 2014), the DSU awarded \$1,065,804 in State General Funds and estimates having \$311,769 in Part B Funds to award amongst the network of CILs through the State contracting process.

The funding allocation percentages for all centers is as follows:

Part C Centers

Atlantis Community Inc.: 3.5%

Center for Disabilities: 13%

Center for Independence: 6%

Center for People with Disabilities: 6%

Connections for IL: 13%

DCIL/MHILC: 3.5%

Non-Part C Centers

CO Springs Independence Center: 10%

Disabled Resource Services: 15%

ILC/NWCCI: 15%

SWIC: 15%

Recipients of funding must be state-certified and comply with the requirements of Title VII Chapter 1, Part C regulations. Eligibility for IL services is determined by individual CILs per Colorado State Rules.

Part II: Narrative: Section 3 - Design for the Statewide Network of Centers

3.1 Existing Network

Provide an overview of the existing network of centers, including non-Part C-funded centers that comply with the standards and assurances in section 725 (b) and (c) of the Act, and the geographic areas and populations currently served by the centers.

There are 10 centers in the statewide network of centers that serve all 64 counties with Part B and State General Funds. Nine of the 10 CILs are currently certified with the state and only 6 of these are Part C CILs that cover 36 of the 64 counties. The network provides cross disability services and depending upon their location within the state, their underserved consumers may include: deaf and hard of hearing, people of color, youth, and people living in rural and frontier counties.

CENTERS AND CATCHMENT AREAS (By County)

1. Atlantis Community, Inc., Denver:

Part C: Adams (shared with DCIL), Arapahoe (shared with DCIL), Boulder (shared with CPWD), Denver (shared with DCIL), Douglas (shared with DCIL), El Paso, Jefferson (shared with DCIL).

Part B and State General Fund:

Adams, Arapahoe, Denver, Jefferson

2. Center for Disabilities, Pueblo:

Part C: Baca, Bent, Crowley, Custer, Fremont, Huerfano, Kiowa, Las Animas, Otero, Prowers, Pueblo

Part B and State General Fund:

Alamosa, Baca, Bent, Conejos, Costilla, Crowley, Custer, Fremont, Huerfano, Kiowa, Las Animas, Otero, Pueblo, Prowers, Rio Grande, Saguache

3. Center for Independence, Grand Junction:

Part C: Delta, Eagle, Gardfield, Grand, Gunnison, Hinsdale, Jackson, Lake, Mesa, Montrose, Ouray, Pitkin, San Miguel.

Part B and State General Fund:

Delta, Chaffee, Eagle, Garfield, Gunnison, Hinsdale, Lake, Mesa, Montrose, Ouray Pitkin, San Miguel

4. Center for People with Disabilities, Boulder:

Part C: Adams (shared with Atlantis and DCIL), Boulder (shared with Atlantis), Weld (shared with Connections)

Part B and State General Funds: Adams (shared with Atlantis), Boulder, Broomfield, Gilpin, Jefferson (shared with DCIL/MHILC).

5. Connections for Independence, Greeley:

Part C: Larimer, Morgan, Washington, Weld (shared with CPWD)

Part B and State General Funds: Logan, Morgan, Phillips, Sedgewick, Washington, Weld, Yuma

6. Disabled Resource Services, Fort Collins

Part C: NA

Part B and State General Funds: Jackson, Larimer

7. The Independence Center, Colorado Springs:

Part C: NA

Part B and State General Funds: Cheyenne, Elbert, El Paso, Kiowa, Kit Carson, Lincoln, Park, Teller

8. Southwest Center for Independence, Durango

Part C: NA

Part B and State General Funds: Archuleta, Dolores, LaPlata, Montezuma, San Juan

9. NorthWest Colorado Center for Independence, Steamboat Springs

Part C: NA

Part B and State General Funds: Grand, Moffat, Rio Blanco, Routt, Summit

10. DCIL (DBA Mile High Independent Living Center), Denver

Part C: Adams (shared with Atlantis and CPWD), Arapahoe (shared with Atlantis), Clear Creek, Denver (shared with Atlantis), Douglas (shared with Atlantis), Elbert, Gilpin, Jefferson (shared with Atlantis)

NOTE: this Center was out of compliance and did not receive State General and Part B funds at the time this SPIL was developed.

3.2 Expansion of Network

Describe the design for the further expansion of the network, including identification of the unserved and underserved areas in the State and the order of priority for serving these areas as additional funding becomes available (beyond the required cost-of-living increase).

All of Colorado's 64 counties lie within the service area of either a Part C or non-Part C Centers; 18 counties lie within the service areas of the state's 4 non-Part C Centers. Colorado will use the next three years to more accurately identify and develop outreach to un- and underserved populations, develop non-traditional methods of service delivery to rural and frontier counties and support the existing centers to build their capacity. Although there is little expectation that there will be a significant increase in existing funding streams, there is an increasing possibility that funds may become available if a center or centers close, or if a center is unable to expend its full Part B and State General Fund allocations.

The SILC and the DSU have identified the following 5 regions and 2 metro /urban counties in the State that are not being served by Part C CILs, including:

Urban / Metro counties: Broomfield and Larimer.

Northwest counties: Moffat (Frontier), Rio Blanco (Frontier), and Routt (Rural).

Southwest counties: Archuleta (Rural), Dolores (Frontier), La Plata (Rural), Montezuma (Rural), San Juan (Frontier).

South Central counties: Alamosa (Rural), Conejos (Rural), Costilla (Frontier), Mineral (Frontier), Saguache (Frontier)

Central / Central Eastern counties: Chaffee (Rural), Cheyenne (Frontier), Kit Carson (Frontier), Lincoln (Frontier), Park (Metro/Urban), Teller (Metro/Urban).

Northeast counties: Logan (Rural), Phillips (Rural), Sedgwick (Frontier), Washington (Frontier), Yuma (Frontier).

If new, long-term, Part C funding becomes available during the course of this Plan, Colorado has determined that the following conditions must be met before a new Part C Center can be established within the five identified regions:

a). To avoid a funding cliff, a minimum commitment of \$90,747 per year over five years must be met with federal funds. This funding level to establish a Part C Center in Colorado is based on funding that Connections for Independent Living receives, the lowest-funded Part C Center in the state. Connections for IL serves Morgan and Weld counties. Priority will be given to meet the needs of un- and underserved populations identified through this SPIL with additional priority given to the Urban/Metro counties, further delineation of priority areas will be determined through this SPIL.

(b) A strong expression of need arises from the consumers and community in a given area not currently covered by a center in receipt of Part C funds; and

(c) The area can feasibly support a new center.

Should an increase in federal funds not be enough to substantiate the need to compete a center as indicated by the conditions listed above, any additional Part C funds shall be allotted specifically to support the operations of centers as follows:

1. Provide financial support to Part C Centers, in compliance with the standards and assurances, at the level of funding for the previous year if the current year is less;

2. Provide a cost of living increase for existing Centers; and

3. Bring each of the current 6 centers meeting RSA's standards and indicators for CILs, up to a minimum base funding level commensurate with their current funding proportions and accounting for the size and geographic nature of corresponding catchment areas, ensuring that the established statewide network and its infrastructure can be maintained.

4. If new Part C funds become available through a Center closure, the State will utilize the following priorities for funding:

A. Re-examine the service area associated with the original Part C RFPs and redesign the Part B catchment areas to align more closely with Part C CILs already in existence;

B. Rebid the RFP within the state for either existing or new centers.

5. If additional Part B funds become available due to a center's inability to spend down allocated funds or due to center closure the priority for expenditure include:

A. Underfunded goals and objectives in the SPIL;

B. Unanticipated funding cuts;

C. Distribute to the network of state-certified centers utilizing the state's allocation formula for Part B Funds.

6. If additional State General Funds become available due to a center's inability to spend down allocated funds or due to a center closure, the priority for expenditure is

A. Distribute to the network of state-certified centers utilizing the state's allocation formula for State General Funds.

Process for Establishing a New Center

Organizations that intend to become a state-certified Part B or State General Funded center for independent living must apply to the Director of the Division of Vocational Rehabilitation; the organization must demonstrate that it is complying with the standards and assurances of Section 725 of the Rehabilitation Act and the center evaluation standards in accordance with 34 CFR 366.60 and 366.64. This process may include an on-site evaluation. If the DSU determines the organization qualifies to operate as a center, it shall provide written certification for up to 36 months from the date of the compliance determination. Adding a new, instead of replacing a closed, center could impact both State General and Part B allocation formulas the funding priorities listed regarding opening a new Part C center must be met.

Process for Closing a Center

A pre-requisite for Part B and SG funding in the state is certification by the DSU and SILC. A center's state certification can be revoked if it fails to meet the requirements of 34 CFR 366.40 366.46 or if it fails to meet contract requirements within the statement of work and its exhibits. The DSU and the SILC may institute a site evaluation outside of the Site Evaluation schedule based on review of monthly reports and invoices, including lack of documentation and/or based on changes in the number of people served as reported monthly, according to the following procedures:

1. A site evaluation is scheduled utilizing the evaluation standards from 34 CFR 366.60 and 366.64; the evaluation may also include a financial audit performed by the CDHS Auditor's Office.

2. A monitoring report is submitted to the Center within 30 days of the site visit; the Center has 45 days to respond with a Corrective Action Plan addressing any compliance or audit findings; the DSU has 30 days to respond and either approve the CAP or request further clarification. An extension of these timelines can be requested by the Center, but approval rests with the DSU. Timelines for the CDHS Auditors' Office are separate from the DSU's.

3. If a Center does not complete its CAP within these timelines (including an approved extension) the DSU can initiate the de-certification process, which impacts the ability of the Center to contract or to continue contracting with the State; a Center without an approved CAP 6 months into the State Fiscal Year (January) will lose its certification and the remainder of its contract.

4. If a de-certified Center has not regained its certified-status within one month of the beginning of the State Fiscal Year (May), it will not contract with the State for that year.

3.3 Section 723 States Only

3.3A If the State follows an order of priorities for allocating funds among centers within a State that is different from what is outlined in 34 CFR 366.22, describe the alternate order of priority that the DSU director and the SILC chair have agreed upon. Indicate N/A if not applicable.

NA

3.3B Describe how the State policies, practices and procedures governing the awarding of grants to centers and the oversight of these centers are consistent with 34 CFR 366.37 and 366.38.

NA

Part II: Narrative: Section 4 - Designated State Unit (DSU)

4.1 Administrative Support Services

4.1A Describe the administrative support services to be provided by the DSU for the SILS (Part B) program and, if the State is a Section 723 State, for the CIL (Part C) program. Refer to the SPIL Instructions for additional information about administrative support services.

The DSU utilizes Part B funds to provide a SILC Coordinator responsible for supporting the SILC in achieving the goals and objectives of the state plan, through the State contracting system. The job description is revised every three years to ensure that the person hired for this position will meet the needs of the SILC. The SILC Coordinator is supervised by the SILC Chair who also conducts performance evaluations consistent with SILC by-laws, policies, and procedures which ensures SILC autonomy from the DSU.

The DSU employs an FTE to serve as the state's IL Program Coordinator. This person is the designated liaison with the SILC, attends all SILC meetings and provides technical assistance. The role of the ILPC with the network of Centers includes monitoring, oversight, and technical assistance. The ILPC promotes collaboration between the Centers, the SILC, and the DSU.

The DSU had employed a .25 FTE Administrative Assistant to provide support to the IL Unit including the SILC. This position is considered to be a DSU position and not a SILC staff position. Duties included arranging SILC meetings, reimbursing SILC members for travel and other meeting expenses, paying SILC bills and tracking SILC expenditures, providing a monthly financial report, maintaining the SILC roster, distributing meeting notices, and other duties as assigned. The AA vacated the position and due to a hiring freeze, the state has not been able to re-fill it.

4.1B Describe other DSU arrangements for the administration of the IL program, if any.

NA

Part II: Narrative: Section 5 - Statewide Independent Living Council (SILC)

5.1 Resource plan

5.1A Describe the resource plan prepared by the SILC in conjunction with the DSU for the provision of resources, including staff and personnel, made available under parts B and C of chapter 1 of title VII, section 101(a)(18) of the Act, and from other public and private sources that may be necessary to carry out the functions of the SILC identified in section 705(c). The description must address the three years of this SPIL.

- Refer to the SPIL Instructions for more information about completing this section.

For more information click the icon.

The SILC Resource plan is funded through two sources: Division of Vocational Rehabilitation and Part B under Title VII of the Rehabilitation Act. Under the General fund, the SILC has received \$48,500 annually for at least three SPILs or nine years. These funds are used to support the operating expenses of the SILC. In addition the SILC receives \$30,000 from Part B funds which funds the part time coordinator who is a consultant on contract. This amount has not changed over at least three SPIL cycles.

The SILC does not have an office or office related expenses except those that are incurred by the DSU on the SILC's behalf. The consultant works from his/her own space and uses his/her personal computer and other equipment. Much of the work of the SILC is done by committee using teleconferencing and at the five to six formal meetings that the SILC conducts in various parts of the state.

The budget for the next three year cycle of the SPIL was set by the SILC Finance Committee; the first year is based on the same figures from previous SPILs; however, years 2 and 3 reflect additional funds to continue and expand the SILC's work on behalf of Coloradoans with disabilities and to meet the goals and objectives included in this SPIL.

Year 1

Personnel

SILC Coordinator \$30,000

The SILC Coordinator will remain a part time consultant at \$30,000 annually. This amount will cover the Coordinator's time (20 hours a week), office expenses and work related travel other than travel to formal SILC meetings. Travel to formal SILC meetings will be covered in the operating budget.

Administrative Support in-kind

A part time administrative assistant will provide services to the SILC. This person is responsible for setting up meetings and paying the bills of the SILC. The Division of Vocational Rehabilitation provides administrative support through its existing staff.

Total Personnel \$30,000

Operating Expenses

Professional Services \$5,000

The SILC pays for frequent updates to the SILC website and engages professionals such as writers, facilitators, and trainers as needed to carry out the work of the SILC.

Travel \$10,000

This line item is used to pay for the travel of SILC members and the Coordinator to bi-monthly SILC meetings held across the state. It is also used to pay for committees, focus groups and outreach meetings that SILC members attend across the state. Costs include mileage and other travel costs (cab, train, bus, van, and on rare occasions air travel); hotel charges; and per-diem costs consistent with 2CFR230; Memorandum to Grantees Regarding the Use of Grant Funds for Conferences and Meetings, U.S. Department of Education, June 2012 (GAN Enclosure 7).

Meetings \$7,000

This line item pays for the meeting costs such as room rental, catering, internet, and other costs related to meetings.

Program Accommodations \$5000

This line item funds disability-based accommodations needed by members or other participants to fully participate in our meetings both face to face and by telephone. Costs include sign language interpreters, alternate print and personal assistance needs to travel and participate in SILC meetings.

Operating Costs \$4,500

This line item covers conference calls, printing, postage, minor equipment purchases, and general supplies. In the first year of this SPIL, there are funds to supplement the mapping needs and disseminate information to the centers.

Training funds \$6,500

These funds will be used to provide training for SILC members and CIL staff as described in Objective 1A.

Conferences \$5,000

The SILC hopes to send two people to the SILC Congress and hopes to participate in at least one other national conference such as NCIL or APRIL.

Dues \$ 1,500

This line item is to pay for dues for such organizations as NCIL and minority organizations that promote outreach to underserved populations.

Miscellaneous \$0.00

The SILC does not anticipate any miscellaneous costs at this time.

Needs Assessment \$4,000

This line item covers the costs of focus groups, surveys, data collection, and data analysis.

Total Operating Costs for Year 1 \$48,500

YEAR 2

Personnel

SILC Coordinator \$50,000

This position will remain a contract position but the expectation is that the SILC Coordinator will go to full time at \$50,000. The SILC expects that this person will attend meetings in Denver and be the face of the SILC. In addition, he/she will develop content for the SILC website, assist with the development of additional issue briefs, conduct on-going needs assessment activities and support additional SILC committees/workgroups on specific issues such as emergency preparedness, housing, assistive technology, transportation and access to basic services such as food and emergency/temporary housing.

Administrative Assistant in-kind

A part time administrative assistant will provide services to the SILC. This person is responsible for setting up meetings and paying the bills of the SILC. The

Division of Vocational Rehabilitation provides administrative support through its existing staff.

Total Personnel \$50,000

Operating Expenses

Professional Services \$9,000

The SILC pays for frequent updates to the SILC website and engages professionals such as writers, facilitators, and trainers as needed to carry out the work of the SILC. The DSU will engage a VISTA to act as a resource development technician as described in Goal 2.

Travel \$10,000

This line item is used to pay for the travel of SILC members and the Coordinator to bi-monthly SILC meetings held across the state. It is also used to pay for committees, focus groups and outreach meetings that SILC members attend across the state. Costs include mileage and other travel costs (cab, train, bus, van, and on rare occasions air travel); hotel charges; and per-diem costs consistent with 2CFR230; Memorandum to Grantees Regarding the Use of Grant Funds for Conferences and Meetings, U.S. Department of Education, June 2012 (GAN Enclosure 7).

Meetings \$7,000

This line item pays for the meeting costs such as room rental, catering, internet, and other costs related to meetings.

Program Accommodations \$5,000

This line item funds disability-based accommodations needed by members or other participants to fully participate in our meetings both face to face and by telephone. Costs include sign language interpreters, alternate print and personal assistance needs to travel and participate in SILC meetings.

Operating Costs \$2,500

This line item covers conference calls, printing, postage, minor equipment purchases, and general supplies.

Training funds \$4,000

These funds will be used to provide training for SILC members and CIL staff as described in Objective 1A.

Conferences \$20,0000

In the second year of the SPIL, the SILC will provide resources for a statewide conference for IL staff. One person will be sent to the SILC Congress.

Dues \$ 1,500

This line item is to pay for dues for such organizations as NCIL and minority organizations that promote outreach to underserved populations.

Miscellaneous \$0.00

The SILC does not anticipate any miscellaneous costs at this time.

Needs Assessment \$2,000

This line item covers the costs of focus groups, surveys, data collection, and data analysis.

Total Operating Costs for Year 2 \$61,000

YEAR 3

Personnel

SILC Coordinator \$50,000

This position will remain a contract position. The SILC Coordinator will be full time at \$50,000. The SILC expects that this person will attend meetings in Denver and be the face of the SILC. In addition, he/she will develop content for the SILC website, assist with the development of additional issue briefs, conduct on-going needs assessment activities and support additional SILC committees/workgroups on specific issues such as emergency preparedness, housing, assistive technology, transportation and access to basic services such as food and emergency/temporary housing.

Administrative Assistant in-kind

A part time administrative assistant will provide services to the SILC. This person is responsible for setting up meetings and paying the bills of the SILC. The Division of Vocational Rehabilitation provides administrative support through its existing staff.

Total Personnel \$50,000

Operating Expenses

Professional Services \$3,000

The cost of professional services is reduced as the fulltime SILC Coordinator takes on more responsibility for writing and facilitation. Funds remain available for services if needed and for the maintenance and updating of the SILC website.

Travel \$10,000

This line item is used to pay for the travel of SILC members and the Coordinator to bi-monthly SILC meetings held across the state. It is also used to pay for committees, focus groups and outreach meetings that SILC members attend across the state. Costs include mileage and other travel costs (cab, train, bus, van, and on rare occasions air travel); hotel charges; and per diem costs consistent with 2CFR230; Memorandum to Grantees Regarding the Use of Grant Funds for Conferences and Meetings, U.S. Department of Education, June 2012 (GAN Enclosure 7).

Meetings \$7,000

This line item pays for the meeting costs such as room rental, catering, internet, and other costs related to meetings.

Program Accommodations \$5,000

This line item funds disability based accommodations needed by members or other participants to fully participate in our meetings both face to face and by telephone. Costs include sign language interpreters, alternate print and personal assistance needs to travel and participate in SILC meetings.

Operating Costs \$2,500

This line item covers conference calls, printing, postage, minor equipment purchases, and general supplies.

Training funds \$4,000

These funds will be used to provide training for SILC members and CIL staff as described in Objective 1A.

Conferences \$20,0000

In the third year of the SPIL, the SILC will provide resources, in partnership with DSU and CILs, for a statewide summit for youth with disabilities. Two SILC members will attend SILC Congress. Funds permitting, one other national conference will be attended by at least one SILC member.

Dues \$1,500

This line item is to pay for dues for such organizations as NCIL and minority organizations that promote outreach to underserved populations.

Miscellaneous \$0.00

The SILC does not anticipate any miscellaneous costs at this time.

Needs Assessment and SPIL Development \$5,000

This line item covers the costs of focus groups, surveys, data collection, data analysis and other components of SPIL development.

Total Operating Costs for Year 3 \$59,000

5.1B Describe how the following SILC resource plan requirements will be addressed.

- The SILC's responsibility for the proper expenditure of funds and use of resources that it receives under the resource plan.

The SILC finance committee develops an annual line item budget, allocating adequate resources for meeting expenses, training, conferences, and meeting objectives of the SPIL. The budget is reviewed by the finance committee which is chaired by the SILC treasurer. A report of expenditures is furnished by the DSU to the SILC. The finance committee looks at year-to-date expenditures, percentages spent in each line item, and makes recommendations to the executive committee about any adjustments that should be made. The SILC treasurer gives a financial report at general SILC meetings, and members are provided with a copy of the report.

- Non-inclusion of conditions or requirements in the SILC resource plan that may compromise the independence of the SILC.

The SILC has discretion over its budget, within the parameters of state fiscal rules.

- Reliance, to the maximum extent possible, on the use of resources in existence during the period of implementation of the State plan.

The SILC carefully considers its responsibilities within the SPIL when developing its budget. Because the SILC is not a non-profit and the state constitution does not allow organizations within the state government to raise or receive outside funds, the SILC has no choice but to manage its resources.

5.2 Establishment and Placement

Describe how the establishment and placement of the SILC ensures its independence with respect to the DSU and all other State agencies. Refer to the SPIL Instructions for more information about completing this section.

The Colorado SILC was established under Senate Bill 97-141. It is an autonomous body with control over its finances for which the DSU is the fiduciary agent. The SILC is awarded a budget amount by DVR, but creates its own line item allocations and makes its own decisions about expenditures. Members are appointed by the Governor through the Governor's Office of Boards and Commissions. The SILC has a process in place for recruiting, interviewing, and recommending new SILC members. Recommendations are made to the Governor's Office of Boards and Commissions, and then appointments are made by the Governor. The DSU plays no part in membership or financial decisions other than ensuring compliance with State fiscal rules and the executive order that established the Colorado SILC.

The SILC meets five to six times per year at different locations around the state in order to hear public comment, be visible in the community, expend the travel budget as equitably as possible and acquaint SILC members with Colorado's CILs. Committee meetings are usually accomplished by conference call. The SILC staff person is supervised by the SILC chair, has a vendor contract with the State, and is not directed by the DSU in any way. The IL Program Coordinator for the DSU is an ex-officio, non-voting member of the SILC and subject to term limits.

5.3 Appointment and Composition

Describe the process used by the State to appoint members to the SILC who meet the composition requirements in section 705(b). Refer to the SPIL Instructions for more information about completing this section.

The Colorado SILC, follows all mandates set out in Section 705 of the Rehabilitation Act of 1973, as amended. The Executive Order creating the Colorado SILC has been amended to reduce the maximum number of SILC members from 23 to 15. These slots must be filled in accordance with Section 705. The SILC By-Law reflects the same composition.

Although the SILC reviews applications and makes recommendations for membership, the final membership decision is made by the Governor as applications are presented by the Governor's Office of Boards and Commission. Boards and Commissions acknowledges the necessity of compliance with Section 705 and the Executive Order in regard to SILC composition. New members can only be added if they do not adversely affect the balance of a majority of people with disabilities who are not state or CIL employees. It is also the responsibility of that office to determine which slot is to be filled, and whether the member fills the remainder of an existing term or the full term of a vacancy. SILC By-Laws

reflect Section 705 and the Executive Order as to the term limits of two full three year terms for any SILC member.

The DSU is included in this process by an internal memo that includes the entirety of information to be forwarded to Boards and Commissions.

5.4 Staffing

Describe how the following SILC staffing requirements will be met.

- SILC supervision and evaluation, consistent with State law, of its staff and other personnel as may be necessary to carry out its functions.

The SILC Coordinator contracts with the state to serve the SILC. The SILC Coordinator works independently from a location other than the DSU, and is supervised by the SILC Chair.

- Non-assignment of duties to SILC staff and other personnel made available by the DSU, or any other State agency or office, that would create a conflict of interest while assisting the SILC in carrying out its duties.

In the past, the DSU provided a .5 FTE Program Assistant who assisted the SILC with anything that required access to the state accounting system or required contracts or agreements with the state. Currently, the IL Program Coordinator who serves as DSU liaison with the SILC must also provide the SILC's administrative support. As funds become available from the State, the SILC will continue to advocate over the course of the SPIL for a Program Assistant who would provide administrative support for the SILC and for the IL Program Coordinator.

Part II: Narrative: Section 6 - Service Provider Requirements

Describe how the following service provider requirements will be met:

6.1 Staffing

- Inclusion of personnel who are specialists in the development and provision of IL services and in the development and support of centers.

The DSU monitors all ten centers for independent living, making sure that services are being provided by qualified staff in compliance with 34 CFR 354.23. The DSU requires that all Centers submit job descriptions showing job duties and qualifications for funded staff with annual contract renewal.

- Availability, to the maximum extent feasible, of personnel able to communicate (1) with individuals with significant disabilities who rely on alternative modes of communication, such as manual communication, nonverbal communication devices, Braille, or audio tapes and (2) in the native languages of individuals with significant disabilities whose English proficiency is limited and who apply for or receive IL services under title VII of the Act.

In addition to typical monitoring and site reviews, the DSU reviews the centers' 704 reports and takes note of each center's ability to communicate in appropriate alternative formats.

- Establishment and maintenance of a program of staff development for all classes of positions involved in providing IL services and, where appropriate, in administering the CIL program, improving the skills of staff directly responsible for the provision of IL services, including knowledge of and practice in the IL philosophy.

The DSU and CILs for this SPIL have allocated funds to provide for the training of CILs staff.

- Affirmative action to employ and advance in employment qualified individuals with significant disabilities on the same terms and conditions required with respect to the employment of individuals with disabilities under section 503 of the Act.

All Colorado Centers for Independent Living must have a non-discrimination policy. Centers must also comply with the federal mandate that at least 51% of a center's staff be comprised of people with significant disabilities.

6.2 Fiscal Control and Fund Accounting

- Adoption of those fiscal control and fund accounting procedures as may be necessary to ensure the proper disbursement of and accounting for funds made available through parts B and C of chapter 1 of title VII of the Act, in addition to complying with applicable EDGAR fiscal and accounting requirements.

The DSU requires that all certified centers meet these fiscal requirements and monitors accordingly. Independent audits are required annually through the contract renewal process; the DSU monitors fiscal control and accounting procedures during interactions that occur through processing monthly grant invoices. The DSU has also entered into a close working relationship with the Department of Human Services Auditor's Office, whose staff participate in compliance site reviews and will be providing support in the development of a financial monitoring tool for site review and center director use over the course of this SPIL. Additionally, in accordance with the 2012 MTAG, all Part B Centers will complete either a Cost Allocation Plan or Indirect Cost Rate over the course of this SPIL.

6.3 Recordkeeping, Access and Reporting

- Maintenance of records that fully disclose and document the information listed in 34 CFR 364.35.

All contracts for independent living services and OIB services between the DSU and the CILs require assurances of record keeping in compliance with federal requirements. The DSU audits consumer service records as a typical element of a site review.

- Submission of annual performance and financial reports, and any other reports that the Secretary determines to be appropriate

Based on contractual agreement and state IL Rules, the DSU receives and reviews the annual performance reports of the nine currently state-certified centers for independent living by the designated date. Centers are required to maintain the supporting documentation for fiscal control and fund accounting procedures that insure proper use of and accounting for State and Federal funds. Monthly reimbursements require an itemized invoice and service report. Centers will also submit any other reports/data as may be requested by the Secretary or Commissioner.

- Access to the Commissioner and the Comptroller General, or any of their duly authorized representatives, for the purpose of conducting audits, examinations, and compliance reviews, to the information listed in 34 CFR 364.37.

Records maintained and kept by Centers and the DSU, both fiscal and programmatic, are kept in secure locations to ensure that independent auditors,

department and state auditors and any federal representative may review when necessary.

6.4 Eligibility

- Eligibility of any individual with a significant disability, as defined in 34 CFR 364.4(b), for IL services under the SILS and CIL programs.

Any individual with a significant disability is eligible for independent living services as described in this document.

- Ability of any individual to seek information about IL services under these programs and to request referral to other services and programs for individuals with significant disabilities.

Information and referral continues to be a core service of all CILs, and is available to eligible consumers upon request. Information and referral is also available upon request from the SILC and the DSU about IL services/programs and other service and programs for individuals with significant disabilities

- Determination of an individual's eligibility for IL services under the SILS and CIL programs in a manner that meets the requirements of 34 CFR 364.51.

To be deemed eligible for services, an individual must declare that he or she has a significant disability that limits an activity of daily living and impedes his or her ability to live independently in the community. Through State IL Rules, the responsibility for determining eligibility for services has been given to the individual centers.

- Application of eligibility requirements without regard to age, color, creed, gender, national origin, race, religion, or type of significant disability of the individual applying for IL services.

All CILs, the SILC, and the DSU have these policies in place to ensure that all individuals, regardless of their protected classification, are eligible for services.

- Non-exclusion from receiving IL services of any individual who is present in the State and who is otherwise eligible for IL services, based on the imposition of any State or local residence requirement.

No eligible consumer is excluded due to residence requirements.

6.5 Independent Living Plans

- Provision of IL services in accordance with an IL plan complying with Sec. 364.52 and mutually agreed upon by the individuals with significant disabilities and the appropriate

service provider staff unless the individual signs a waiver stating that an IL plan is unnecessary.

Independent Living Plans, with goals and objectives mutually agreed upon, must be included in the consumer service record, must be updated as necessary, and must be fully explained to consumers who engage in CIL services.

6.6 Client Assistance Program (CAP) Information

- Use of accessible formats to notify individuals seeking or receiving IL services under chapter 1 of title VII about the availability of the CAP program, the purposes of the services provided under the CAP, and how to contact the CAP.

A document describing access to CAP services in the most appropriate format for the consumer is issued during the IL intake, and a signed copy becomes part of the consumer service record. The SILC and the DSU also provide this information to individuals who may need additional assistance or wish to address a grievance about a particular CIL.

6.7 Protection, Use and Release of Personal Information

- Adoption and implementation of policies and procedures meeting the requirements of 34 CFR 364.56(a), to safeguard the confidentiality of all personal information, including photographs and lists of names.

A confidentiality agreement is a standard part of the IL intake process, and a signed document is included in the consumer service record. Contracts with the DSU require compliance with CFR 364.56 (a) and additionally require compliance with HIPAA. The confidentiality policy is examined during site reviews, and the use of the facility is observed and questions are asked regarding the location of confidential discussions between consumer and CIL staff.

Part II: Narrative: Section 7 - Evaluation

Describe the method that will be used to periodically evaluate the effectiveness of the plan in meeting the objectives established in Section 1. The description must include the State's evaluation of satisfaction by individuals with significant disabilities who have participated in the program.

Section 7: Evaluation

Goal(s) and the related Objective(s) from Section 1	Method that will be used to evaluate
<p>Goal 1 Identify Disability Population Hubs</p>	<p>Disability population hubs will be identified in both rural and urban areas, allowing for more target outreach and efficient use of resources through the SILC SPIL ad hoc committee: The compilation of statewide information that delineates both consumers with disabilities and services already in existence will lead to the development of a guide for the network of centers on best practices in outreach to un- and underserved communities in Colorado. This will lead to an increase in outreach to and collaboration with local support groups and service providers for un-and underserved communities.</p>
<p>Goal 2 Increase Capacity of Centers to provide services</p>	<p>The IL Partners will work together to increase the capacity of centers to provide services throughout their catchment areas:</p> <p>CILS will develop staff development and training opportunity policies to ensure their staff are qualified; the number of staff development and training opportunities will be tracked along with the number of staff attending training from each Center.</p> <p>A baseline of compliance review issues from the previous SPIL will be established and compared to compliance review issues documented during this SPIL to determine the effect of training and staff development on the compliance review process. This goal also includes a fund raising objective; in the last quarter of the SPIL, the SILC will produce a report on increases in non-government CIL-funding during the SPIL period. Data from 704 reports during the last quarter of the SPIL will be used to determine increases in the provision of services offered outside of the primary CIL locations.</p> <p>Information, activities and results from this goal will be used for the development and distribution of an annual report on the progress and accomplishments of the IL Network.</p>

<p>Goal 3 Increase Involvement of Youth in Independent Living</p>	<p>The IL Partners will work together to increase the involvement of youth in independent living programs, creating a natural succession plan for the future of independent living: the SILC will develop a youth advisory committee that will consist of at least 51% youth with disabilities and will have identified methods which IL service providers may utilize to reach youth in the state; at least three centers will provide opportunities to train youth within their own programs; 704 reports will be used to track increases in youth service provision by IL Centers (with a baseline from 2012 704 reports).</p>

Part II: Narrative: Section 8 - State-Imposed Requirements

8 State-Imposed Requirements

Identify any State-imposed requirements contained in the provisions of this SPIL.

Operations of the SILC are constricted by state regulations governing the operations of state agencies including reports required, accounting practices, procurement rules, personnel policies, and travel reimbursement.